

Exhibit C

A. Leonard Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**DECLARATION OF MELISSA A. LEONARD IN SUPPORT OF
DEBTORS' APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE
EMPLOYMENT AND RETENTION OF WHITE & CASE LLP AS ATTORNEYS TO
THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

I, Melissa A. Leonard, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am an Executive Vice President, General Counsel, and Secretary of Lordstown Motors Corp., a debtor in these Chapter 11 Cases. I submit this declaration (the “Declaration”) in support of the Application (the “**Application**”) of Lordstown Motors Corp. and its debtor affiliates, as debtors and debtors in possession (collectively, the “**Debtors**”), pursuant to sections 327(a), 329 and 1007 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rules 2014-1 and 2016 1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), for authority to retain and employ White & Case LLP (“**White & Case**” or the “**Firm**”), as bankruptcy counsel for the Debtors effective as of the Petition Date. Except as otherwise noted, I have personal knowledge of the matters set forth herein.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

2. White & Case is proposed to serve as bankruptcy counsel to the Debtors. The Debtors recognize that a careful selection should be made when selecting and managing chapter 11 counsel to ensure that bankruptcy professionals are subject to the same client-driven market forces, scrutiny, and accountability as professionals in non-bankruptcy engagements. To that end, in selecting White & Case to represent the Debtors in a potential restructuring, the Debtors considered whether, within the last two (2) years, White & Case had the expertise in the relevant legal issues and in similar proceedings, and, in particular, their familiarity with large corporate restructurings.

3. The Debtors retained White & Case because of its extensive experience in large and complex corporate reorganizations and seeks to continue to retain White & Case due to White & Case's acquired familiarity with the Debtors. In preparing to represent the Debtors in connection with the Chapter 11 Cases, White & Case has acquired in-depth knowledge of the Debtors' operations and capital structure and gained additional insight into the current condition of the Debtors' businesses. In addition, during the course of its representation of the Debtors, White & Case has acquired extensive knowledge with respect to the Debtors' claims against (and disputes with) Foxconn, additional matters relating to the Debtors' operations, and additional issues which may arise in connection with the Debtors' efforts to market and sell their assets or which may otherwise arise during the Chapter 11 Cases. The Debtors believe that White & Case is both well-qualified and uniquely able to represent the Debtors in the Chapter 11 Cases in an efficient and timely manner.

4. The Debtors desire to employ White & Case because of the extensive legal services that will be required in connection with the Chapter 11 Cases and White & Case's familiarity with the business of the Debtors.

5. In my capacity as Executive Vice President, General Counsel, and Secretary, I am responsible for supervising outside counsel retained by the Debtors in the ordinary course of business, and I participate in monitoring and controlling costs of the business, including legal costs. White & Case has provided and will be providing professional services to the Debtors under its standard rate structure. White & Case has informed the Debtors that its rates under its standard rate structure are consistent among bankruptcy representations undertaken under the standard rate structure, including related transactional and litigation services. White & Case has further informed the Debtors that its rates and terms under its standard rate structure for non-bankruptcy engagements are the same as the rates and the terms for the Debtors' engagement of White & Case. I am also responsible for reviewing the invoices regularly submitted by White & Case, and can confirm that the rates that White & Case charged the Debtors in the prepetition period are the same as the rates that White & Case will charge the Debtors in the postpetition period, based on the terms of the Engagement Agreement, subject to periodic rate increases, as described in the Application. White & Case has informed the Debtors that the Firm's standard hourly rates are subject to periodic adjustment in accordance with the Firm's practice.

6. White & Case has developed and shared with the Debtors a prospective budget and staffing plan to comply with the U.S. Trustee's requests for information and additional disclosures, and any orders of the Court, recognizing that in the course of the Chapter 11 Cases, there may be unforeseeable events that will need to be addressed by the Debtors and White & Case. The Debtors recognize that it is their responsibility to closely monitor the billing practices of their counsel to ensure that the fees and expenses paid by the estate remain consistent with the Debtors' expectations and the exigencies of the Chapter 11 Cases. The Debtors will continue to review the invoices that White & Case regularly submits, and, together with White & Case, periodically refine

and amend the budget and staffing plan as the case develops.

7. While every chapter 11 case is unique, the budget prepared to address the U.S. Trustee's fee guidelines, will provide guidance on the periods of time involved and the level of the attorneys and professionals that will work on various matters, as well as projections of average hourly rates for the attorneys and professionals for various matters.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: July 6, 2023
Lordstown, Ohio

By: /s/ Melissa A. Leonard
Name: Melissa A. Leonard
Title: Executive Vice President, General Counsel,
and Secretary of Lordstown Motors Corp.